

December 7, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Re: Regulation of Prepaid Calling Card Services, WC Docket No. 05-68

Dear Ms. Dortch:

Yesterday, Jack Zinman, Brent Olson and I of AT&T and David Lawson of Sidley Austin Brown & Wood LLP had a telephone conversation with Michelle Carey, Legal Advisor to Chairman Martin, Tom Navin, Chief of the Wireline Competition Bureau, and Ian Dillner, Terri Natoli and Christi Shewman of the Wireline Competition Bureau. During the discussion, we reiterated AT&T's positions in the above-referenced proceeding and stressed the need for interim measures that would, on a prospective basis and pending completion of comprehensive universal service and intercarrier compensation reform, subject all prepaid card service providers to the same universal service and access charge obligations as other providers of traditional person-to-person telephone calling services. We also discussed the proposals of other commenters who agree that prepaid card providers should uniformly contribute to universal service and pay access charges (pending comprehensive intercarrier compensation reform), but urge the Commission to reach that same outcome through a permanent regulatory classification ruling that all prepaid card service providers, regardless of the particular characteristics of their services, provide basic telecommunications services.

One electronic copy of this Notice is being submitted to the Secretary in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

/s/ Eric Einhorn

Eric Einhorn

cc: Michelle Carey  
Tom Navin  
Ian Dillner  
Terri Natoli  
Christi Shewman